

1 CHRISTOPHER CHIOU  
2 Acting United States Attorney  
3 Nevada Bar No. 14853  
4 DANIEL D. HOLLINGSWORTH  
5 Assistant United States Attorney  
Nevada Bar No. 1925  
501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101  
(702) 388-6336  
Daniel.Hollingsworth@usdoj.gov  
6 Attorneys for the United States

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

2:08-CR-064-JCM-GWF

Plaintiff,

V.

STEVEN W. GRIMM,  
EVE E. MAZZARELLA,  
MELISSA R. BEECROFT.

**Government's Unopposed Motion to Extend Time to File its Motions Regarding *Honeycutt* and the Eighth Amendment as Applied to the Defendants or to Settle under ECF No. 861  
(Eighth Request)**

## Defendants

This Motion to Extend Time is the eighth request. LR IA 6-1.

The United States of America respectfully moves this Court for an Order extending the time for the government to file its Motions Regarding *Honeycutt* and the Eighth Amendment as Applied to the Defendants or to Settle under ECF No. 835. The reason is the parties are actively engaged in negotiations to resolve the forfeiture matters. The current deadline is November 1, 2021. The government requests an extension until May 6, 2022.

The forensic review of the records is completed. The parties continue to negotiate the settlement of their respective forfeiture amounts. The three defendants need more time to review the forensic records, the underlying documents, the summary, and the analysis of these many records.

On October 18, 2021, Angela Dows, counsel for Melissa R. Beecroft, Paola Armeni, counsel for Steven W. Grimm, and Gabriel Grasso, counsel for Eve E. Mazzarella, agreed to this extension.

1 Because of the foregoing reasons, the government requests the extension of time until  
2 May 6, 2022, for the defendants to finish reviewing the records, defendants and the  
3 government to settle, and if settlements do not occur, to place the required documents on a  
4 computer program as evidence, to file motions, responses, replies, and to have a forfeiture  
5 hearing.

6 This Motion is not submitted solely for the purpose of delay or for any other  
7 improper purpose.

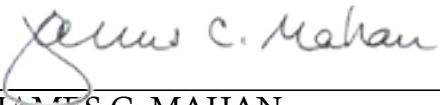
8 This Court should grant an extension of time to, and including, May 6, 2022.

9 DATED: October 19, 2021.

10 CHRISTOPHER CHIOU  
11 Acting United States Attorney

12 /s/ Daniel D. Hollingsworth  
13 DANIEL D. HOLLINGSWORTH  
14 Assistant United States Attorney

15 IT IS SO ORDERED:

16   
17 JAMES C. MAHAN  
18 UNITED STATES DISTRICT COURT JUDGE

20 DATED: October 20, 2021